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Appl. No. 10/815,484
Amdt. Dated 1/12/2007
Reply to Office Action of November 13, 2006

REMARKS

This Amendment is in response to the Office Action mailed November 13, 2006. In the Office Action, claim 1 was rejected under 35 U.S.C. §112 (first paragraph) and claims 1-20 and 22-23 were rejected under 35 U.S.C. §103. Reconsideration in light of the amendments and remarks made herein is respectfully requested.

Rejection Under 35 U.S.C. §112, first paragraph

Claim 1 was rejected under 35 U.S.C. §112, first paragraph. Applicant respectfully traverses the rejection. The recitation cited by the Examiner clearly describes an embodiment of the invention where a connection between the core logic (700) and the first CA logic block (655₃) is disabled when it is desired to descramble incoming scrambled content in accordance with a CA function that does not involve the first CA logic block. For this illustrative embodiment for Figure 6, disabling the connector may preclude descrambling using the CA function associated with the first CA logic block, but other CA functions associated with other CA logic blocks (e.g., blocks 655₁ and 655₂) may be used.

Based on the foregoing, Applicant respectfully requests that the Examiner withdraw the outstanding §112 rejection.

Rejection Under 35 U.S.C. §103

Claims 1, 2 and 11-13 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Ansari (U.S. Publication No. 2004/0221302) in view of Kisliakov (U.S. Patent Application No. 2003/0212895). Again, Applicant respectfully traverses rejection because a *prima facie* case of obviousness has not been established.

As the Examiner is aware, to establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify a reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all of the claim limitations. *See MPEP §2143; see also In Re Fine, 873 F. 2d 1071, 5 U.S.P.Q.2D 1596 (Fed. Cir. 1988)*. Herein, the combined teachings of the cited references fail to describe or suggest all the claim limitations.

In fact, the Office Action presents contradicting arguments for the rejection of independent claim 1. First, the Office Action states that Kisliakov teaches "card configuration features and options that by default renders the card to a disabled configuration state unless the required commands of the card are configured and executed to enable and function the card as described." *See page 3 of the Office Action*. However, the Office Action further states that Ansari teaches a connection between the core logic and the first CA logic block that is "disabled when descrambling of the incoming scrambled content is to be conducted according to the second CA function." *See page 5 of the Office Action*. Applicant respectfully disagrees with both of these contradictory positions and respectfully requests the Examiner to withdraw the

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finality of the rejection in order to fully articulate the changing rationale for maintaining the outstanding §103(a) rejection if such rejection is maintained after reconsideration of the allowability of the claims by the Examiner.

With respect to independent claim 1 for example, Applicant respectfully submit that neither Ansari nor Kisliakov, alone or in combination, describe or suggest *disabling a connection between the first CA logic block and the core logic when descrambling of the incoming scrambled content is to be conducted according to the second CA function*. Emphasis added. Rather, as further elaborated on page 5 of the Office Action, Ansari describes programmable conditional access systems (PCAS) which provide a common hardware platform for conditional access of premium television services from direct broadcast satellite and/or cable service providers. However, Ansari does not provide any mechanism for disabling the connection between the core logic and CA logic blocks that are not going to be used.

Additionally, Kisliakov teaches an authentication scheme for a user of the card (password-based). See paragraphs 321 and 357 of Kisliakov. However, this password-based authentication scheme has no relationship to the disabling of a connection between the core logic and a CA logic block as claimed.

Similarly, with respect to independent claim 11, Applicant respectfully submits that neither Ansari nor Kisliakov, alone or in combination, describes or suggests enabling *only* the first conditional access logic block of the plurality of conditional access logic blocks [that is coupled to the core logic] when the incoming scrambled content is scrambled according to the first CA function. Emphasis added. Instead, it appears that the PCAS teach the support of two versions of conditional access (CA) and digital rights management (DRM) in order to receive premium channels from multiple service providers, and not directed to providing a common architecture and subsequently modifying this architecture to perform a particular CA function.

More specifically, Ansari describes PCAs 50 featuring a first and second versions of CA and DRM simultaneously residing in the PCAS to receive premium channels from both cable and satellite providers. See lines 3-11 in paragraph 21 of Ansari. Alternatively, Applicant respectfully submits that Ansari teaches the second version of the CA and DRM being substituted for the first version ("second version can reside in the PCAS...after the first version of CA and DRM has resided therein"). See lines 11-13 in paragraph 21 of Ansari. There is no teaching of the presence of multiple CA logic blocks and the enablement of one of these CA logic blocks as claimed.

As a result, withdrawal of the §103 rejection as applied to claims 1-2 and 11-13 is respectfully requested.

Claims 3-10, 14-19, 20, and 22-23 were rejected under 35 U.S.C. §103(a) as being unpatentable over Ansari in view of Kisliakov and Kocher (U.S. Patent No. 6,289,455). Applicant respectfully traverses this rejection in its entirety.

With respect to independent claim 20, none of the cited references, alone or in combination, teach or suggest each and every limitation set forth in this claim. For instance, the

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combined teachings of the cited references do not teach or suggest a programmable logic device including a plurality of programmable gates programmed to operate in accordance with a conditional access (CA) function associated with a first CA provider to descramble the incoming scrambled content, *the programmable gates of the programmable logic device are one-time programmable and battery-backed*. While the Office Action states that Figure 10 (item 1053) of Kocher provides such teaching, Applicant respectfully disagrees because (i) there is no element "1053" in Kocher, and (ii) there is no teaching of the one-time programmability as claimed. The non-volatile storage recited does not denote one-time programmability but may be programmed multiple times.

With respect to claims 3-10, 14-15 and 21-23 that are dependent on independent claims 1, 11 and 20, which are considered to be in condition for allowance, Applicant refrains from discussing the grounds for allowability of these dependent claims due to the allowability of their independent claims. However, Applicant reserves the right to present such arguments if an appeal is warranted since there are a variety of limitations that are alleged to be shown by the references, but are not shown after review. Such matters will be further addressed in the appeal brief as needed.

Applicant respectfully requests that the outstanding §103(a) rejection as applied to claims 3-10, 14-19, 20, and 22-23 be withdrawn and reserves the right to submit such arguments in the event that an Appeal is necessary.

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Conclusion

Applicant respectfully requests that a timely Notice of Allowance be issued in this case.

Respectfully submitted,

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Dated: January 12, 2007

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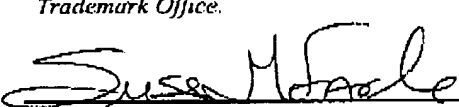
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